

PSJ11 CVS Opp Exh 4

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
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5 -----x
6 IN RE: NATIONAL PRESCRIPTION) Case No.
7 OPIATE LITIGATION) 1:17-MD-2804
8 APPLIES TO ALL CASES) Hon. Dan A. Polster
9 -----x

10
11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
12 CONFIDENTIALITY REVIEW
13 VIDEOTAPED DEPOSITION OF PAMELA HINKLE

14 WASHINGTON, D.C.

15 THURSDAY, JANUARY 24, 2019

16 9:06 A.M.

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21 Reported by: Leslie A. Todd
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1 MR. BAKER: Okay.

2 MS. MILLER: -- as she considers your
3 questions.

4 BY MR. BAKER:

5 Q Okay. Respectfully, I'm going to ask
6 you this question. Respectfully, I request that
7 you answer it, okay?

8 The question is simply this: The IRR
9 recap report is a recap of which orders on the IRR
10 daily report for that month were subjected by the
11 LP analyst to further due diligence review,
12 correct?

13 MS. MILLER: Object to form. Asked and
14 answered.

15 THE WITNESS: The report was -- the
16 information was put on the report that -- of
17 information that they -- they would do reviews for
18 and put -- placed on that report, sir. That's
19 what I -- I know happened.

20 BY MR. BAKER:

21 Q Do you know why something appears on
22 this report?

23 MS. MILLER: Object to form.

24 THE WITNESS: They were doing reviews on

1 those -- on that information, sir.

2 BY MR. BAKER:

3 Q So if there was not a review done on an
4 order of interest that appeared on the IRR, if
5 there's no review done, then it's not going to
6 appear on this report, correct?

7 MS. MILLER: Object to form.

8 THE WITNESS: Sir, I -- I can't answer
9 that. I don't know.

10 BY MR. BAKER:

11 Q Ma'am, you were the manager. Are you
12 telling me you don't know why something would
13 populate on the control IRR recap report?

14 MS. MILLER: Object to form.

15 THE WITNESS: I know that they used this
16 form. I know that they put information from --
17 when they reviewed on this form, sir, but I can't
18 tell you anything other than that, that that's
19 what they did, that's what they used.

20 BY MR. BAKER:

21 Q And this form was used for what?

22 MS. MILLER: Object to form, asked and
23 answered.

24 BY MR. BAKER: